

Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TANA IHRIG and MARK IHRIG,)	NO. 2:06-cv-00512-RSM
)	
Plaintiffs,)	DEFENDANT SHERMAN
)	FINANCIAL GROUP, LLC's RULE
v.)	26(a)(1) DISCLOSURES
)	
WASHINGTON MUTUAL BANK, <i>et al.</i> ,)	
)	
Defendants.)	

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendant Sherman Financial Group, LLC ("Sherman Financial") provides the following information:

A. IDENTITY OF INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION RELEVANT TO DISPUTED FACTS.

Defendant Sherman Financial identifies the following individual(s), other than Plaintiffs and the other named Defendants, who may have relevant information: John Shinovich, Authorized Representative, Sherman Financial.

Identification of any person does not constitute a representation that such person has information that is nonprivileged, nor does it constitute a waiver of any privilege or objection that may be made to such witness's testimony.

Defendant Sherman Financial may identify additional witnesses through discovery and continued investigation. Defendant Sherman Financial specifically reserves the right to offer witnesses at trial that are not identified above.

DEFENDANT SHERMAN
FINANCIAL GROUP, LLC's
RULE 26(a)(1) DISCLOSURES
0605-03 ss

STEPHEN A. BERNHEIM
ATTORNEY AT LAW
512 Bell Street
Edmonds, Washington 98020
(425) 712-8318
Fax (425) 712-8418
e-mail:steve@stevebernheim.com

B. DESCRIPTION (BY CATEGORY) OF ALL DOCUMENTS, DATA COMPILATIONS AND TANGIBLE THINGS THAT MAY BE RELEVANT TO DISPUTED FACTS.

Defendant Sherman Financial identifies the following categories of documents, data compilations and tangible things that may be relevant to disputed facts: (i) notes of Defendant Resurgent Capital Services, LP, received after Plaintiffs filed this action; and (ii) notes of the agencies with whom Plaintiffs' account was placed, received by Sherman Financial after Plaintiffs filed this action.

Defendant Sherman Financial anticipates that Plaintiffs and the other named Defendants may also have documents, records, data and things that may be relevant to disputed facts.

Defendant Sherman Financial may identify additional categories of documents, data compilations, and other tangible things through discovery and continued investigation. Defendant Sherman Financial specifically reserves the right to offer exhibits at trial that do not fall within the above-listed category.

C. COMPUTATION OF DAMAGES CLAIMED BY DEFENDANT.

Not applicable.

D. INSURANCE AGREEMENTS WHICH MAY BE LIABLE TO SATISFY PART OR ALL OF A JUDGMENT.

Defendant Sherman Financial has not tendered the defense of this claim to its insurance provider.

DATED this 26th day of July, 2006

/s/ Stephen A. Bernheim
 Stephen A. Bernheim, WSBA #15225
 Attorney for Defendants LVNV Funding, LLC,
 Resurgent Capital Services, LP and Sherman
 Financial Group LLC

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